

1 DARRYL P. RAINS (CA SBN 104802)
2 DRains@mofo.com
3 MORRISON & FOERSTER LLP
4 755 Page Mill Road
5 Palo Alto, California 94304-1018
6 Telephone: 650.813.5600
7 Facsimile: 650.494.0792

8 JUDSON E. LOBDELL (CA SBN 146041)
9 JLobdell@mofo.com
10 MARK R.S. FOSTER (CA SBN 223682)
11 MFoster@mofo.com
12 MORRISON & FOERSTER LLP
13 425 Market Street
14 San Francisco, CA 94105-2482
15 Telephone: 415.268.7000
16 Facsimile: 415.268.7522

17 Attorneys for defendant
18 Hewlett-Packard Company

19
20
21
22
23
24
25
26
27
28

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15
16
17 IN RE HP SECURITIES LITIGATION
18 This Document Relates To: All Actions

19 Master File No. C-12-5980 CRB

20
21
22
23
24
25
26
27
28

CLASS ACTION

**STIPULATION AND ORDER
REGARDING PAGE LIMITS ON
BRIEFING**

1 Lead Plaintiff and defendant Hewlett-Packard Company (“HP”) hereby stipulate and
 2 agree, by and through their undersigned counsel of record, as follows:

3 **RECITALS**

4 A. This securities class action was commenced on November 26, 2012.

5 B. On March 4, 2013, this Court appointed PGGM Vermogensbeheer B.V. as Lead
 6 Plaintiff. (Doc. 90.)

7 C. On March 7, 2013 this Court approved PGGM’s selection of Kessler Topaz
 8 Meltzer and Check, LLP as sole Lead Counsel. (*See* Doc. 94.)

9 D. On May 3, 2013 Lead Plaintiff filed the Consolidated Complaint (“Complaint”) in
 10 this matter. (Doc. 100). The Complaint asserts claims for violations of the Securities Exchange
 11 Act of 1934 against HP and individual defendants Michael R. Lynch, Margaret C. Whitman,
 12 Léo Apotheker, Shane V. Robison, Catherine A. Lesjak, Raymond J. Lane, and James T. Murrin.
 13 The Complaint contains 241 paragraphs of allegations, and bases claims on numerous statements
 14 spanning over a year that are allegedly attributable to HP and/or its current and/or former officers
 15 and directors. The Complaint also refers to over 100 documents, including press releases, SEC
 16 filings, analyst reports, transcripts of calls, and news articles.

17 E. Pursuant to the schedule established by the Court’s January 4, 2013 Order,
 18 Defendants’ Motion to Dismiss is due no later than July 2, 2013; Lead Plaintiff’s oppositions to
 19 the motions to dismiss are due no later than September 2, 2013; and Defendants’ reply papers are
 20 due no later than October 2, 2013. (*See* Doc. 25.)

21 F. The Civil Local Rules of this Court provide that memoranda of points and
 22 authorities may not exceed 25 pages (L.R. 7-2(b)), and this Court’s Standing Order provides that
 23 memoranda may not exceed 15 pages.

24 G. HP submits that, given the scope of the putative class period, the large number of
 25 challenged statements, and the legal issues that must be addressed, the ordinarily-governing page
 26 limits would prevent HP from adequately setting forth its arguments in support of dismissal.

H. The undersigned parties met and conferred to discuss page limits for the briefing on HP's anticipated Motion to Dismiss and appropriate modifications to the briefing limits in light of the nature and status of this case.

4 I. Given that this case is a securities class action governed by the Private Securities
5 Litigation Reform Act of 1995, and in light of the length and number of allegations in the
6 Complaint, the complex nature of the causes of action and factual assertions, the number of
7 defendants, and the legal issues anticipated, the undersigned parties believe that it would be
8 appropriate to modify the page limitations set forth in this Court's Standing Order and the Civil
9 Local Rules.

STIPULATION

11 NOW, THEREFORE, the undersigned parties stipulate, subject to Court approval, as
12 follows:

13 1. Defendant HP's memorandum in support of its anticipated Motion to Dismiss shall
14 not exceed 35 pages in length.

15 2. Lead Plaintiff's anticipated memorandum in opposition to HP's Motion to Dismiss
16 shall not exceed 35 in length.

18 || Dated: June 20, 2013

KESSLER TOPAZ MELTZER & CHECK LLP

By /s/ Ramzi Abadou
RAMZI ABADOU

RAMZI ABADOU (SBN 222567)
ELI R. GREENSTEIN (SBN 217945)
STACEY M. KAPLAN (SBN 241989)
PAUL A. BREUCOP (SBN 278807)
IOANA A. BROOKS (SBN 253123)
One Sansome St., Suite 1850
San Francisco, CA 94104
Tel: 415.400.3000
Fax: 415.400.3001
rabadou@ktmc.com
egreenstein@ktmc.com
skaplan@ktmc.com
pbreucop@ktmc.com
ibrooks@ktmc.com

1 and
2

3 DAVID KESSLER
4 DARREN J. CHECK
5 280 King of Prussia Road
6 Radnor, PA 19087
7 Tel.: 610.667.7706
8 Fax: 610.667.7056
dkeSSLER@ktmc.com
dcheck@ktmc.com

9
10 Attorneys for Lead Plaintiff
11 PGGM VERMOGENSBEHEER B.V.
12 AND LEAD COUNSEL FOR THE CLASS

13 Dated: June 20, 2013

14 MORRISON & FOERSTER LLP
15 DARRYL P. RAINS
16 JUDSON E. LOBDELL
17 MARK R.S. FOSTER

18 By: /s/ Darryl P. Rains
19 Darryl P. Rains

20 Attorneys for defendant
21 Hewlett-Packard Company

22 **ORDER**

23 Pursuant to the foregoing stipulation, and good cause appearing,

24 **IT IS SO ORDERED.**

25 Dated: June 24, 2013

